

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

JOHN TURNER	:	CIVIL ACTION
AND	:	
NANNETTE TURNER	:	
vs.	:	
B.V. SHIPPING COMPANY	:	
LUZON STRAIT (GRONINGEN)	:	NO. 04-0936-JJF

PLAINTIFFS' REQUESTED VOIR DIRE QUESTIONS

1. Do you know or are you familiar with the plaintiffs John and Nannette Turner who reside at 701 W. 19th Street, Wilmington, DE 19802?
2. The defendant B.V. Shipping Company Luzon Strait (Groningen), hereinafter referred to as B.V. Shipping, is a business entity which owns sea going vessels and has its principal place of business in Groningen, The Netherlands. Have you or anyone in your immediate family ever been employed by or had any form of business relationship with defendant?
3. Have you ever heard of B.V. Shipping Company, and, if so, in what context?
4. This case involves a ship which was owned by the defendant. The name of that ship is the M/V Luzon Strait. Do any of you have any familiarity with that vessel and, if so, in what context?
5. Do you know or are you familiar with the attorneys involved in this case or have you or anyone in your immediate family ever done business with any of the law firms involved in this case?

Plaintiff

STANLEY B. GRUBER
FREEDMAN & LORRY, P.C.
400 Market Street, Suite 900
Philadelphia, PA 19106

STEPHEN B. POTTER
POTTER, CARMINE, LEONARD &
AARONSEN
840 N. Union Street
Wilmington, DE 19805

Defendant

RICHARD Q. WHELAN
PALMER, BIEZUP & HENDERSON
956 Public Ledger Building
Independence Mall West
620 Chestnut Street
Philadelphia, PA 19106

MICHAEL B. McCUALEY
PALMER, BIEZUP & HENDERSON
1223 Foulk Road

Wilmington, DE 19803

6. Have you or anyone in your immediate family ever had any contact with any of the following medical practitioners who may testify or be referred to in this case?

Richard Katz, M.D.

Katz, Bennett, Levin, Neurology Associates
Albert Einstein Medical Center, Northern Division
Klein Building, Suite 405
5401 Old York Road
Philadelphia, PA 19141

Ronald Greene, M.D.

1525 Locust Street, 2nd Floor
Philadelphia, PA 19102

Bruce Katz, M.D., Orthopaedic Surgeon

First State Orthopaedics
4745 Ogletown-Stanton Road
Suite 225
Newark, DE 19713

Irene Fisher, Psy. D., Clinical Psychologist

2006 Foulk Road, Suite B
Wilmington, DE 19810

Tae Sup Song, M.D.;

2401 Pennsylvania Ave.
Suite 111
Wilmington, DE 19806

Papastavros Associate;
1701 Augustine Cut-Off, Suite 100
Professional Building IV
Wilmington, DE 19711

Anthony L. Cucuzzella;

Gladys Fenichel, M.D. (psychiatrist)
210 Kent Rd.
Ardmore, Pa. 19003

7. Do any of your know or had any contact with the following individuals who may be called upon to give expert testimony in this case?

Hector V. Pazos, Naval Architect and Marine Engineer
566 Villa Grande Avenue. S.
St. Petersburg, FL 33707

Robert Wolf, Expert Economist/Vocational
1939 Route 70 East, Suite 120
Cherry Hill, NJ 08003

James Pascuiti, MA
Employment and Rehabilitation Consulting Services
155 Morris Avenue
Springfield, NJ 07081-1421

Ronald Signorino, Liability Expert
8 Homestead Road
Basking Ridge, NJ 07920

Jerome Staller, Ph. D. (Economist)
Philadelphia, Pa

8. Have you or anyone in your immediate family ever been employed in any maritime form of employment such a working for a stevedore aboard a ship or working aboard a vessel for any ship owner? If so, please explain.

9. At the time of the accident involved in this case the plaintiff John Turner was employed by Delaware River Stevedores, a stevedoring company performing services in the Ports of Wilmington, Delaware, Philadelphia, Pennsylvania and Camden, New Jersey. Have you or anyone in your immediate family ever done business with, worked for or known anyone who worked for Delaware River Stevedores?

10. Do any of you know or have you ever had any contact with any of the following employees of Delaware River Stevedores?

Sean Brady
1104 Melrose Place
Newark, DE 19702

William Henry Grinnell
519 E. 35th Street
Wilmington, DE 19802

Cliff Lasch
13 Cyprus Point Court
Blackwood, NJ 08012

11. The plaintiff John Turner is a member of International Longshoremen Association Local 1694. Do any of you have any personal or philosophic feelings or positions regarding labor unions in general or the International Longshoremen Association which would interfere with your ability to render a fair and impartial verdict in this case?

12. Have you, anyone in your immediate family or a close friend ever been employed as a longshoremen? If so, please explain.

13. Is anyone in your immediate family or a close friend an attorney or otherwise involved in the legal profession? If so, in what field of law does he or she work?

14. Is anyone in your immediate family or any of your close friends a physician? If so, in what field of medicine does he or she specialize?

15. Have you or anyone in your immediate family ever brought a claim or lawsuit by reason of personal injury? If so, what was the nature of the claim?

16. Have you or anyone in your immediate family ever had a claim or lawsuit brought against you by someone claiming damages for personal injury?

17. Have you ever served on a jury before? If so, what was the nature of the case and where did you serve?

18. Have you or anyone in your immediate family ever been employed in investigating or adjusting claims for personal injury? If so, please explain.

19. Have you or anyone in your immediate family ever been employed in an occupation which would require you to supervise other employees? If so, please explain.

20. Are you or anyone in your immediate family employed by a company engaged in the casualty or liability insurance business? If so, please explain.

21. Are you or anyone in your immediate family stock holders in any company which, in whole or in part, has engaged in the casualty or liability insurance business?

22. Do you have any personal or philosophic feelings or position which would prevent you from rendering a fair and impartial verdict in a case where a plaintiff longshoremen is seeking damages from the owner of a ship on which the plaintiff longshoremen claims that he suffered personal injuries as a result of the negligence of such ship owner?

Respectfully Submitted,

/S/ Stephen B. Potter
STEPHEN B. POTTER (ID# 298)
POTTER, CARMINE, LEONARD &
AARONSEN
840 N. Union Street
Wilmington, DE 19805

/S/ Stanley B. Gruber
STANLEY B. GRUBER
FREEDMAN & LORRY, P.C.
400 Market Street, Suite 900
Philadelphia, PA 19106